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Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**STIPULATION TO MODIFY SCHEDULE
REGARDING AMIR SHAHMIRZA'S
MOTION FOR SUMMARY JUDGMENT**

[Related to Dkt. No. 12130]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized debtors
2 (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases
3 (the “**Chapter 11 Cases**”), on the one hand, and Creditor Amir Shahmirza (“**Shahmirza**,” and together
4 with the Reorganized Debtors, the “**Parties**” and each, a “**Party**”) on the other hand, by and through
5 their respective counsel, hereby stipulate and agree as follows:

6 **RECITALS**

7 A. On April 8, 2022, the Reorganized Debtors filed the *Reorganized Debtors’ Objection to*
8 *Proof of Claim No. 2090 Filed by Amir Shahmirza* (the “**Objection**”) [Docket No. 12130]. Concurrently
9 with the Objection, the Reorganized Debtors filed the *Notice of Hearing on Reorganized Debtors’*
10 *Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket No. 12132], which set a hearing
11 on the Objection for May 10, 2022.

12 B. On April 22, 2022, after the Parties conferred regarding continuing the hearing and
13 response deadline for Shahmirza, the Reorganized Debtors filed the *Notice of Continued Hearing on*
14 *Reorganized Debtors’ Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket
15 No. 12208], which continued the hearing on the Objection to July 12, 2022.

16 C. On June 28, 2022, Shahmirza filed the *Response and Points and Authorities in Opposition*
17 *to Objection to Claim #2090* [Docket No. 12572].

18 D. On July 1, 2022, the Parties entered into a stipulation [Docket No. 12585] to further
19 continue the hearing on the Objection to October 11, 2022, which was approved by an order entered on
20 July 6, 2022 [Docket No. 12594].

21 E. On October 4, 2022, the Reorganized Debtors filed the *Reply in Support of Reorganized*
22 *Debtors’ Objection to Proof of Claim No. 2090 Filed by Amir Shahmirza* [Docket No. 13045].

23 F. At the hearing on October 11, 2022, the Court held a status conference on the Objection.
24 The appearances for counsel for Shahmirza and the Reorganized Debtors were as noted on the record.

25 G. By docket text entry on October 11, 2022, the Court set December 8, 2022, as the deadline
26 for Shahmirza to file a motion for summary judgment (the “**Shahmirza Motion**”) and set a status
27 conference for December 13, 2022.
28

1 H. On November 22, 2022, the Parties entered into a stipulation [Docket No. 13280],
2 whereby the parties agreed to drop the December 13 status conference from the Court's calendar, and
3 further agreed to a briefing schedule on the Shahmirza Motion. The stipulation was approved by an
4 order entered on November 23, 2022 [Docket No. 13283]. A hearing on the Shahmirza Motion is
5 scheduled for March 7, 2023 at 10:00 a.m. (Pacific Time).

6 I. The Parties have conferred further regarding the briefing schedule related to the
7 Shahmirza Motion and wish to modify the schedule as set forth below.

8
9 **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, BY AND**
10 **BETWEEN THE PARTIES, THROUGH THE UNDERSIGNED, AND THE PARTIES**
11 **JOINTLY REQUEST THE BANKRUPTCY COURT TO ORDER, THAT:**

12 1. Shahmirza shall file and serve the Shahmirza Motion on or before January 31, 2023.

13 2. The Reorganized Debtors shall file and serve an opposition to the Shahmirza Motion and,
14 at their discretion, a cross-motion for summary judgment (the "PG&E Brief") on or before March 3,
15 2023.

16 3. Shahmirza shall file and serve a reply in support of the Shahmirza Motion on or before
17 March 20, 2023.

18 4. A hearing on the Shahmirza Motion and PG&E Brief will be held on **April 11, 2023**, at
19 10:00 a.m. (Pacific Time).

20 5. The March 7, 2023 hearing on this matter is dropped from the calendar.

21 6. The Stipulation and any Order approving the terms of this Stipulation are without
22 prejudice to any Party requesting a further continuance of the Hearing or otherwise modifying the
23 briefing schedule on the Objection.

24 7. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or controversies
25 arising from this Stipulation or any Order approving the terms of this Stipulation.

26 8. In the event that the terms of this Stipulation are not approved by the Bankruptcy Court,
27 it shall be null and void and have no force or effect.
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Dated: December 28, 2022

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